

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

DAVID J. WARD (CABN 239504)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7230
David.ward@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 21-00294 WHO
)	
Plaintiff,)	MOTION TO UNSEAL
)	
v.)	
)	
PAUL FREDRICK GIUSTI,)	
)	
Defendant.)	
)	

On August 13, 2021, defendant Paul GIUSTI pled guilty before this Court to a one-count Information charging him with Conspiracy to Commit Honest Services Wire Fraud. *Dkt 26*. At the request of the government, Exhibit A of the Plea Agreement, containing the factual basis for the plea, was filed under seal because the government's investigation of the facts underlying defendant GIUSTI's conduct was ongoing. There is no longer an investigative need by the government to keep defendant GIUSTI's factual admissions in Exhibit A under seal. The undersigned Assistant U.S. Attorney consulted with counsel for defendant GIUSTI, who has no objection to unsealing Exhibit A.

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MOTION TO UNSEAL/PROPOSED ORDER 1
CR 21-00294 WHO

1 Therefore, the government respectfully requests that this Court order that Exhibit A to defendant
2 GIUSTI's plea agreement be unsealed.

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5 STEPHANIE M. HINDS
6 United States Attorney

7 Dated: February 2, 2023

8 /s/ David J. Ward
9 DAVID J. WARD
Assistant United States Attorney

10 For good cause shown, it is **SO ORDERED**.

11
12 Dated: _____

13 HONORABLE WILLIAM H. ORRICK
14 United States District Court Judge